

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CLEMENT WOGHIREN,

Plaintiff,

V.

WYETH, And

WYETH BIOPHARMA,

Defendants.

CIVIL ACTION NO. 04-12148 WGY

## JOINT MOTION TO EXTEND DEADLINE FOR DISCOVERY

The parties in this action respectfully request the Court extend the discovery deadline for ninety (90) days from June 17, 2005 to September 15, 2005. As grounds therefore, the parties state:

1. The parties were previously involved in attempts to schedule a court-ordered mediation. The attempts at scheduling mediation were sufficiently time consuming as to prevent the parties from propounding discovery.
2. To date, discovery is still pending.
3. Ultimately, the parties decided against the use of mediation, resulting in the immediate need to address the current discovery deadline.
4. The requested extension is not being requested for purposes of delay.
5. Pursuant to Local Rule 7.1, the parties have conferred in an attempt to resolve or narrow the issues presented by this motion and counsel for Clement Woghiren has assented to this motion.

**WHEREFORE**, the parties respectfully request that this Honorable Court extend the discovery deadline by 90 days to September 15, 2005, and all other deadlines as set forth herein:

Discovery Deadline:	09/15/05
Motions Deadline:	10/06/05
Final Pretrial Conference:	12/07/05
Jury Trial:	01/02/06

CLEMENT WOGHIREN,

WYETH and WYETH BIOPHARMA

By His Attorney,

By Its Attorney,

/s/ John F. Tocci  
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Attorney for Defendants

Dated: May 12, 2005

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**CERTIFICATE OF SERVICE**

I hereby certify that I filed the above document using the Court's Case Management/Electronic Case Filing System and have served the above document upon all counsel of record pursuant to the Administrative Procedures Governing the Filing and Service by Electronic Means on May 12, 2005.

/s/ Michael A. Fitzhugh